

October 22, 2001



**BorgWarner
Air/Fluid Systems**

The Performance Track Information Center

C/o Industrial Economics Incorporated
2067 Massachusetts Avenue
4th Floor
Cambridge, MA 02140

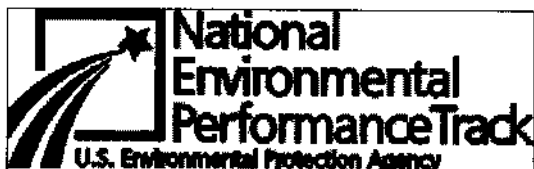
Dear Environmental Achievement Track Review Team:

The employees of BorgWarner Air/Fluid Systems, located at 1350 Franklin Grove Road, Dixon, IL, are pleased and proud to share our environmental pollution prevention challenges and successes. Enclosed is our completed application for consideration for participation in the *U.S. Environmental Protection Agency's National Environmental Achievement Track* program.

Thank you for giving us the opportunity to be recognized for our pollution prevention efforts. In the event you have any questions, or need additional information, please contact Phil Westbrook at telephone (815)288-1462 X320.

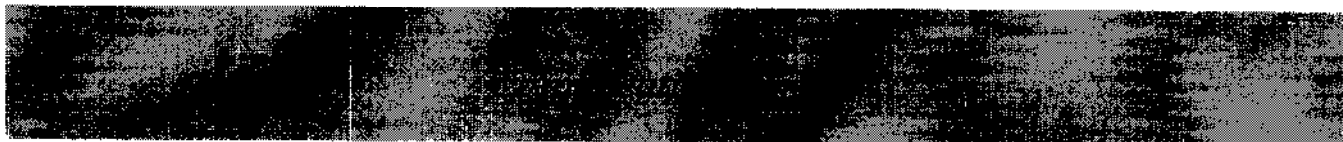
Regards,

Dennis A. Rusiewski
Plant Manager



A05-0051

OCT 31 2001



BorgWarner Air/Fluid Systems

Name of facility

BorgWarner Inc.

Name of parent company (if any)

1350 Franklin Grove Road

Street address

Street address (continued)

Dixon, IL 61021

City/State/Zip code

Give us information about your contact person for the
National Environmental Performance Track Program.

Name Phil Westbrook

Title Facility Engineering Supervisor

Phone 815-288-1462 Ext. 320

Fax 815-288-5021

E-mail pwestbrook@afs.bwauto.com

Why do you need this information?

EPA needs background information about your facility to help us understand the scope and nature of your operations.

Identify the facility you are reporting on.

Identify

Section A

Tell us about your facility.

1 What do you do or make at your facility?

BorgWarner Air/Fluid Systems produces electromechanical and mechanical exhaust recirculation (EGR) valves, emission control valves, and fuel vapor controls.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3714

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

ILD 982220311

1030205012

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.

See attached checklist

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

ISO 14001 Registered Facility-1998
IL Governors Pollution Prevention Awards
A. Medium Facility (100-500 Employees)
B. Continuous Improvement (Demonstrates 5+ years of pollution prevention projects)

Section B

Tell us about your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- a. Environmental policy ☒ Yes
- b. Planning ☒ Yes
- c. Implementation and operation ☒ Yes
- d. Checking and corrective action ☒ Yes
- e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☒ Other Undrewriters Laboratories
Northbrook IL.

Section C

Tell us about your past achievements and future commitments.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you need to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Materials used Recycled/Reused (Plastic Sprues)	0	0	33,000	lbs.
<p>i. How is the current level an improvement over the previous level?</p> <p>Our plastic sprues are a de-listed special waste. Previously the plastic sprues were landfilled or sent through polygrinders and sold for beneficial reuse. The current level reduces the amount of landfilled waste material and reduces the amount of virgin material that is produced and purchased.</p> <p>ii. How did you achieve this improvement?</p> <p>A. Process changes.</p> <p>B. Equipment upgrades which included adding polygrinders, mixers, and a material distribution system.</p> <p>C. Pollution prevention strategies. Environmental objectives and targets; continuous improvement program put in place.</p>				

Section C, continued

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Material used Hazardous material used (Mercury)	35	lbs.	1	lb.

i. How is the current level an improvement over the previous level?

In 1993 BorgWarner Air/Fluid Systems started a program to eliminate the use of Mercury in our plant. During the last several years we have replaced equipment that used Mercury i.e. (manometers, barometers, and thermometers). We eliminated the use of over 100 manometers, 1 barometer, and several thermometers which used over 200 lbs. of Mercury. During the last two years we eliminated the last of the manometers and a barometer which used approximately 35 lbs. of Mercury. Today we only use Mercury in 7 thermostats which contain approximately 1 lb. of Mercury.

ii. How did you achieve this improvement?

A. Equipment upgrades which included electronic digital pressure measurement gauges.

B. Pollution prevention strategies. Environmental objectives and targets and continuous improvement program put in place.

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you are a small facility, you need to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? Materials Used/Recycled/Reused (Plastic sprues)
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. ☒ Option A:
Absolute value 33,000 lbs.
(Quantity/Units)
- ☐ Option B:
In terms of

- units of production or output (Quantity/Units)
- d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- ☒ Option A: Absolute value 68,000 lbs (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement?
- A. Process changes.
- B. Equipment upgrades which include adding mixers, dryers, and material distribution system.
- C. Pollution prevention strategies. Environmental objective and target and continuous improvement program to be put in place.

Second aspect you've selected

- a. What is the aspect?
- Product Performance/Packaging material used. (Returnable containers)
- b. Is this aspect identified as significant in your EMS?
- ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 135 Returnable Containers/week (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- ☒ Option A: Absolute value 173 Returnable Containers/week (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement?
- A. Process Changes
- B. Pollution Prevention Strategies. Environmental objectives and targets and continuous improvement program put in place.

Third aspect you've selected

- a. What is the aspect? Energy use/Total energy used
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|-----------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 6,200,000 KWH
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- | | |
|---|-----------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 6,000,000 KWH
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- e. How will you achieve this improvement?
- A. Equipment upgrades. Which includes HVAC equipment, compressors, vacuum pumps, leak prevention and reduction, and equipment control systems.
- B. Process changes. Which include equipment start up and shut down procedures.
- C. Pollution prevention strategies. Which include implementing Environmental objectives and targets and a continuous improvement program.
- See attached graphs.

Fourth aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS? ☐ Yes ☒ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|---------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 18,000 lbs.
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |

KwH

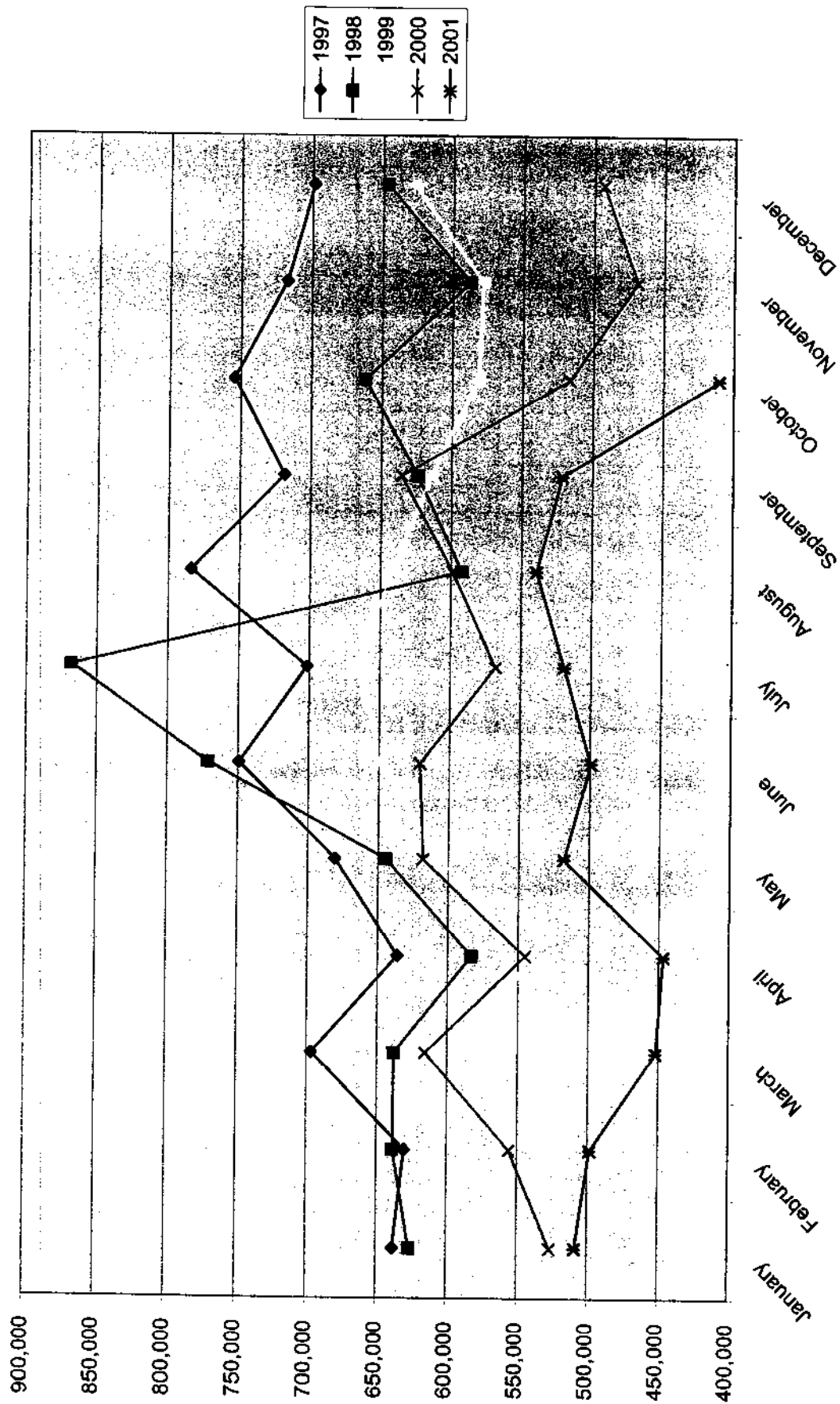
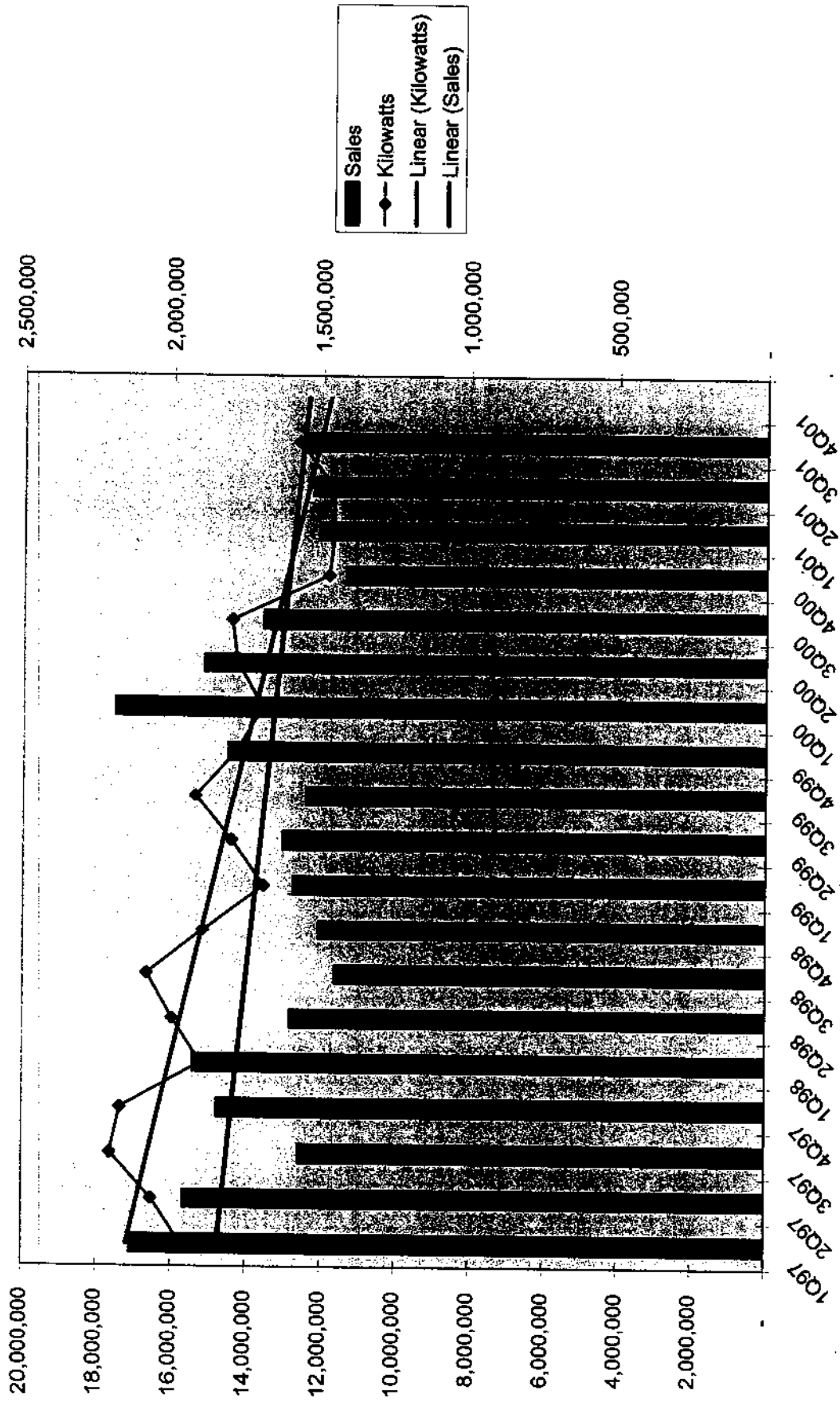


Chart5

KWH vs Sales



d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

☒ Option A:
Absolute value

23,000 lbs.
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

A. Process Changes. Which include how and where we collect recycled paper in the office and the plant. Conduct training and implement a monitoring system on the recycling program.

B. Pollution prevention strategies. Form a Kaizen team and implement a continuous improvement program.

Section D

Tell us about your public outreach and reporting.

1 How do you identify and respond to community concerns?

Support for Outdoor Stewardship Days Program, Lee and Ogle County Soil & Water Conservation District.

ISO 14000 Mentorship Program, IL Dept. of Natural Resources.

Complete Surveys

Environmental Policy and EMS procedure for responding to concerns.

2 How do you inform community members of important matters that affect them?

Attend Lee County Solid Waste Committee meetings.

Publish and share BorgWarner Air/Fluid Systems emergency contingency plan with Lee County ESDA, Dixon Police, and Dixon Fire departments.

3 How will you make the Performance Track Annual Performance Report available to the public?

☐ Website www.

☒ Newspaper

☐ Open Houses

☐ Other

- 4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Lee County Soil & Water Conservation District	Ms. Marcie Near	815-857-3623
State/Local Regulator	Lee County Solid Waste Coordinator	Mr. Walter Willis	815-284-1164
	IL. Dept. of Natural Resources, Waste Management & Research Center	Mr. Ken Barnes	217-244-9940
Other community/local reference	Dixon Fire Dept.	Chief Mike Wilcox	815-288-3323
	Sinow & Wienman	Mr. Rich Wienman	815-288-4407

Section E

Application and Participation Statement.

On behalf of Borg Warner Air/Fluid Systems, Dixon Plc
[my facility],

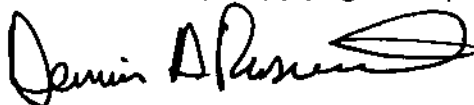
I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Performance Track Program Guide* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the *Environmental Requirements Checklist*). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Performance Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

 10/22/01

Printed Name/Title Dennis A. Rusiewski, Plant Manager

Facility Name BorgWarner Air/Fluid Systems

Facility Street Address 1350 Franklin Grove Road, Dixon, IL

Facility ID Numbers ILD 982220311

1030205012

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK (7875) or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
4th Floor
Cambridge, MA 02140

National Environmental Performance Track

Environmental Requirements Checklist

We've included the following Checklist to help you answer questions in Section A, *Tell us about your facility*. The Checklist will help you identify the *major* federal, state, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application.

Air Pollution Regulations

Check all that apply.

- ☐ 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
- ☒ 2. Permits and Registration of Air Pollution Sources
- ☐ 3. General Emission Standards, Prohibitions, and Restrictions
- ☐ 4. Control of Incinerators
- ☐ 5. Process Industry Emission Standards
- ☐ 6. Control of Fuel Burning Equipment
- ☐ 7. Control of VOCs
- ☐ 8. Sampling, Testing, and Reporting
- ☐ 9. Visible Emissions Standards
- ☐ 10. Control of Fugitive Dust
- ☐ 11. Toxic Air Pollutants Control
- ☐ 12. Vehicle Emissions Inspections and Testing

- ☐ 13. Other (you must list these) Federal, State, Tribal, or Local Regulations Not Listed Above

Hazardous Waste Management Regulations

Check all that apply.

- ☒ 1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - ☒ - Characteristic Waste
 - ☒ - Listed Waste
- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - ☒ - Manifesting
 - ☒ - Pre-transport Requirements
 - ☒ - Record-keeping/Reporting
- ☐ 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - ☐ - Transfer Facility Requirements
 - ☐ - Manifest System and Record-keeping
 - ☐ - Hazardous Waste Discharges
- ☐ 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)

- ☐ - General Facility Standards
- ☐ - Preparedness and Prevention
- ☐ - Contingency Plan and Emergency Procedures
- ☐ - Manifest System, Record-keeping and Reporting
- ☐ - Groundwater Protection
- ☐ - Financial Requirements
- ☐ - Use and Management of Containers
- ☐ - Tanks
- ☐ - Waste Piles
- ☐ - Land Treatment
- ☐ - Incinerators
- ☐ 5. Interim Standards for TSD Owners and Operators (40 CFR 265)
- ☐ 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- ☐ 7. Hazardous Waste Permit Program (Part B) (40 CFR 270)
- ☐ 8. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Hazardous Materials Management

Check all that apply.

- ☐ 1. Control of Pollution by Oil and Other Hazardous Substances (33 CFR 153)
- ☒ 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- ☒ 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- ☒ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- ☒ 5. Community Right-to-Know Regulations (40 CFR 350-372)
- ☐ 6. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Solid Waste Management

Check all that apply.

- ☒ 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- ☒ 2. Permit Requirements for Solid Waste Disposal Facilities
- ☐ 3. Installation of Systems of Refuse Disposal
- ☐ 4. Solid Waste Storage and Removal Requirements
- ☒ 5. Disposal Requirements for Special Wastes
- ☐ 6. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Water Pollution Control Requirements

Check all that apply.

- ☒ 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- ☐ 2. Designation of Hazardous Substances (40 CFR 116)
- ☐ 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- ☐ 4. NPDES Permit Requirements (40 CFR 122)
- ☐ 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- ☒ 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
Name of POTW City of Dixon Lee County
ID # of POTW N/A
- ☐ 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- ☐ 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- ☐ 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- ☒ 10. Water Quality Standards
- ☐ 11. Effluent Limitations for Direct Dischargers
- ☐ 12. Permit Monitoring/Reporting Requirements
- ☐ 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- ☐ 14. Collection, Handling, and Processing of Sewage Sludge
- ☐ 15. Oil Discharge Containment, Control, and Cleanup
- ☐ 16. Standards Applicable to Indirect Discharges (Pretreatment)
- ☐ 17. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Drinking Water Regulations

Check all that apply.

- ☐ 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- ☒ 2. National Primary Drinking Water Standards (40 CFR 141)
- ☐ 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
- ☐ 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- ☐ 5. Underground Injection Control Requirements
- ☐ 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems
- ☐ 7. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Toxic Substances

Check all that apply.

- ☐ 1. Manufacture and Import of Chemicals, Record-keeping, and Reporting Requirements (40 CFR 704)
- ☐ 2. Import and Export of Chemicals (40 CFR 707)
- ☐ 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
- ☐ 4. Chemical Information Rules (40 CFR 712)
- ☐ 5. Health and Safety Data Reporting (40 CFR 716)
- ☐ 6. Pre-manufacture Notifications (40 CFR 720)
- ☐ 7. PCB Distribution Use, Storage, and Disposal (40 CFR 761)
- ☐ 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- ☐ 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

- ☐ 10. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Pesticide Regulations

Check All That Apply

- ☐ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☐ 2. Procedures Storage and Disposal of Pesticides and Containers (40 CFR 165)
- ☐ 3. Certification of Pesticide Applications (40 CFR 171)
- ☐ 4. Pesticide Licensing Requirements
- ☐ 5. Labeling of Pesticides
- ☐ 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- ☐ 7. Disposal of Pesticide Containers
- ☐ 8. Restricted Use and Prohibited Pesticides

- ☐ 9. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Environmental Clean-Up, Restoration, Corrective Action

Check all that apply.

- ☐ 1. Comprehensive Environmental Response, Compensation, and Liability Act (Superfund). Please identify.

- ☐ 2. RCRA Corrective Action

- ☐ 3. Other (you must list these) Federal, State, Tribal, or Local Regulations not listed above

Facility Name Borg Warner Air/Fluid Systems
Facility Location: 1350 Franklin Grove Road Dixon IL.
Facility ID Number(s): ILD 982220311 1030205012